

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Durham Division**

VICTOR VOE, *et al.*,

Plaintiffs,

v.

THOMAS MANSFIELD, *et al.*,

Defendants.

Civil No. 1:23-cv-864

**DECLARATION OF BRIAN K. BOND,
CHIEF EXECUTIVE OFFICER OF PFLAG, INC.**

I, Brian K. Bond, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would testify competently to those facts if called to do so.

2. I submit this declaration in support of Plaintiffs' motion to preliminarily enjoin House Bill 808, "An Act to Prohibit Gender Transition Procedures for Minors." ("H.B. 808").

3. I am the Chief Executive Officer of PFLAG, Inc. ("PFLAG"). Founded in 1973, PFLAG (in full, Parents, Families, and Friends of Lesbians and Gays) is the first and largest organization dedicated to supporting, educating, and advocating for lesbian, gay, bisexual, transgender, and queer ("LGBTQ+") people, and their parents and families, and allies. We are a 501(c)(3) non-profit organization.

4. PFLAG has nearly 350 chapters across the country and more than 350,000 members and supporters nationwide. Our members and supporters cross multiple generations of families in major urban centers, small cities, and rural areas across America. PFLAG envisions an equitable and inclusive world where every LGBTQ+ person is safe, celebrated, empowered, and loved. Our mission is to create a caring, just, and affirming world for LGBTQ+ people and those who love them.

5. Our founder, Jeanne Manford, marched with her son Morty in the 1972 Christopher Street Liberation Day March in New York City and created the very first support group for parents and families of LGBTQ+ people in 1973. Supporting LGBTQ+ young people by supporting and strengthening their families has been a core part of our work ever since. Today, the gold standard advocated by PFLAG parents and families—and set forth by pediatricians and therapists—is to accept, support, and affirm LGBTQ+ people's sexual orientation and/or gender identity and expression. Parental rejection is widely understood to be abusive and damaging.

6. We know, too, that LGBTQ+ youth thrive when supported in their schools and community. So, our work also includes ending bullying, discrimination, and harassment in educational settings by providing training for teachers, administrators, and district leaders, and advocating in the public square to ensure LGBTQ+ people are treated fairly and equally when accessing public accommodations and health care.

7. We know that change happens and support grows one interaction at a time, one family at a time.

8. PFLAG is a national membership organization and we have local chapters in 47 states the District of Columbia, and the United States Virgin Islands. Our 17 chapters in North Carolina are currently in PFLAG Alamance, PFLAG Apex, PFLAG Asheville, PFLAG Charlotte, PFLAG Concord/Kannapolis, PFLAG Fayetteville, PFLAG Flat Rock/Hendersonville, PFLAG Greensboro, PFLAG Greeneville, PFLAG Hickory, PFLAG Lexington, PFLAG Raleigh-Durham/Triangle, PFLAG Salisbury/Rowan, PFLAG Southern Pines, PFLAG Statesville, PFLAG Wilmington/Cape Fear, and PFLAG Winston-Salem.

9. PFLAG's membership is comprised of chapter members and national members. Individuals can become a PFLAG member by joining the national organization directly or by joining their local chapter, which sends a portion of the member's dues to PFLAG National, also making them national members. In addition to our formal members, PFLAG serves thousands of community members through our programs, events, and services every year.

10. PFLAG's members play a central role in electing our organizational leadership. Of the 24 members of the PFLAG National Board of Directors, eight are elected directly by our membership. Eight more are elected by the Regional Directors Council, a body of 13 volunteers who are themselves each elected by the members of one of PFLAG's thirteen regions to work with PFLAG National staff to provide support, resources, training, and help to start new affiliates, and to share the perspectives and

activities of members with PFLAG National staff. The remaining eight are elected by the Board itself.

11. As Chief Executive Officer, I am the leader of the professional staff who carry out the work of the PFLAG National office, including supporting the development and work of the PFLAG Chapter Network and promoting PFLAG's presence in the national arena, including through policy advocacy, coalitions with organizations who share our goals, developing trainings and educational materials, and engaging with the media. Supporting the PFLAG Chapter Network is PFLAG National's largest program, and our national staff works closely with chapter leaders and members across the country to reinforce their efforts to establish and grow their chapters by providing them with infrastructure, publications, online learning tools, advocacy support, media training, and countless other services and supports.

12. Because promoting the wellbeing of LGBTQ+ youth through encouraging and supporting love and affirmation by their families is a core part of our mission and because we have an extensive network of chapters and currently 396 members who live in North Carolina, we have been actively involved in supporting and providing resources to our members and constituents through a legislative session that has involved numerous bills targeting LGBTQ+ people for discriminatory treatment.

13. PFLAG members had been actively engaged in fighting against H.B. 808's passage, voicing their opposition regularly at the statehouse. Given the hostility of the climate in North Carolina towards transgender people in general, and toward youth in

particular, its passage was met with both resignation at its predictability and tremendous fear. New families showed up for chapter support meetings, and chapters planned and participated in events to provide comfort to and celebrate the unbreakable joy of the gender diverse community. PFLAG families with transgender and nonbinary adolescents shared their contingency plans—those with the resources to move or seek care out of state have begun firming up their plans to do so, while the vast majority without those resources have been asking PFLAG National and its local North Carolina chapters for alternative avenues to maintain care in North Carolina. Requests for mental health care providers have skyrocketed, because of the fear, distress, and anxiety that H.B. 808 has and is inflicting on these adolescents. Parents and families are scrambling to make alternative care arrangements.

14. H.B. 808 subjects PFLAG's North Carolina members with a transgender or nonbinary child in need of gender-affirming medical care to a substantial risk of harm. PFLAG has members in North Carolina whose children are being or will be monitored for the appropriate time to begin puberty blockers and/or to begin hormone therapy, as part of a medically prescribed course of care for gender dysphoria. Some of those families are being harmed right now by H.B. 808's passage, whether because they have had appointments for scheduled care cancelled, are losing access to healthcare providers who are moving their practice out of state or ending their provision of gender-affirming care for fear of losing their medical licenses or state funding, or have otherwise had their imminent

plans to obtain the established course of medically necessary care for their transgender or nonbinary children disrupted or foreclosed.

15. Other current and future PFLAG members with transgender or nonbinary children face a substantial risk of being harmed if H.B. 808 is not enjoined, including being denied the right to make medical decisions for their child because the care their child's healthcare providers have declared medically necessary for them has been deemed unlawful; being prevented from obtaining the puberty blockers or hormone therapy their child needs solely because they are treatment for gender dysphoria; or losing coverage for care that has previously been covered using public funding. H.B. 808 strips PFLAG families who need to initiate treatment for gender dysphoria that is not covered by the law's exemption of the ability to obtain that medically necessary care, putting those children at risk of serious mental and physical harm—the very reasons families seek this medical care in the first place.

16. While H.B. 808 has caused or will cause some PFLAG families to leave North Carolina entirely or to have to access the medically necessary care their transgender or nonbinary child needs in another state, the logistical and financial costs of doing so are incredibly high. No family should be forced to leave their home, jobs, or community, or to split up their family to access the established course of medical care for their child's health condition, but H.B. 808 puts North Carolina PFLAG families in exactly that position. Countless others cannot afford to shoulder these costs, and H.B. 808 will leave those transgender and nonbinary North Carolina youth and their families with no way to

access the medically necessary care they need. Parents are prioritizing their children's mental and physical health, but H.B. 808 will deny them the ability to make the decisions that they, their children, and their children's medical providers know are in their best interests. H.B. 808 will put these adolescents' lives at risk.

17. Although these members could challenge H.B. 808 in their own right—as the other Plaintiff family is doing—PFLAG brings claims on behalf of its members to represent their interests to shield them from harm, to vindicate their rights to make the medical decisions they, their child, and their medical providers know to be in their child's best interests, and to allow them to maintain their focus on their child's health and wellbeing rather than litigation.

18. Representing the interests of these members in challenging H.B. 808 is directly connected to PFLAG's mission in two ways. First, that mission includes encouraging and supporting parents and families of transgender and gender non-conforming people in affirming their children and helping them access the social, psychological, and medical supports they need. We work with our families to encourage love and support of their transgender and gender non-conforming children and to help them ensure that the children's needs are met. The provisions of H.B. 808 send the opposite message and prevent families from meeting their child's needs. H.B. 808 bars families from supporting their child's affirmation of their gender identity by seeking the established medically necessary care that has been prescribed for them, depriving youth of medically necessary gender-affirming care, resulting in anxiety, depression, and other negative health

outcomes associated with denying or cutting off medically necessary care. In order to fulfill our mission to our members, we must fight back against a law that prevents them from doing the very thing we encourage because we know it is in the best interests of transgender and nonbinary youth.

19. Second, we teach our members to advocate for a caring, just, and affirming world where LGBTQ+ people are safe, celebrated, empowered, and loved, and to advocate for equitable laws and policies that protect them. We have spoken out against bans on medically necessary care for youth with gender dysphoria such as H.B. 808 because they directly conflict with parents' abilities to act in their children's best interest and do nothing to protect the health and well-being of youth or anyone who needs access to medical care. H.B. 808 is the antithesis of an equitable law, interfering with and obstructing decisions made between PFLAG parents, their child, and their child's provider to deprive that child of care that is proven to be safe, medically sound, and necessary for treating gender dysphoria. As an organization dedicated to parents and families of LGBTQ+ youth, we cannot in good faith sit back as our members' fundamental rights to make decisions about their child's medical care are infringed solely because their child is transgender or nonbinary.

20. PFLAG exists to foster a world where LGBTQ+ children can become thriving, healthy, and happy LGBTQ+ adults. Our members depend on us to provide support and community for them in a society that often still treats their children as worth less than others, attempts to silence them, or denies their very existence. For our members

who have transgender and nonbinary children and are doing nothing more than loving them and following the advice of qualified medical professionals, PFLAG is here to do all we can to support them in those efforts and protect them from harmful, invasive laws like H.B. 808.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of October 2023.

A handwritten signature in black ink, appearing to read "Brian K. Bond", written over a horizontal line.

Brian K. Bond
Chief Executive Officer, PFLAG, Inc.